UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA))
V.) Criminal Case No. 19-CR-10080-NMG
DAVID SIDOO, et al.,	
Defendants	.)

<u>PROTECTIVE ORDER</u>

Defendants Michelle Janavs, Gamal Abdelaziz, Diane Blake and Todd Blake, I-Hsin "Joey" Chen, Amy Colburn and Gregory Colburn, Mossimo Giannulli, Elizabeth Henriquez and Manuel Henriquez, Elisabeth Kimmel, Lori Loughlin, William McGlashan, Jr., John Wilson, Dr. Homayoun Zadeh, and Robert Zangrillo (collectively as "Defendants"), through their undersigned counsel, hereby give notice that they oppose the government's motion for a protective order (the "Motion"). Dkt. No. 317. Defendants object to the substance of the government's proposed protective order as well as the government's failure to meet and confer with the Defendants prior to filing the Motion in violation of Local Rules 37.1(a). *See also* Local Rules 7.1 and 26.2(c).

Defendants respectfully request that the Court defer ruling on the Motion until all defendants have had an opportunity to be heard in opposition pursuant to Local Rules 37.1(c) and 116.3(i). Defendants will attempt to meet and confer with the government in an effort to narrow the areas of disagreement. In the absence of an agreement, Defendants will file an opposition to the Motion no later than April 23, 2019.

Respectfully Submitted,

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By her attorneys,

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CERTIFICATE OF SERVICE

I, John Littrell, hereby certify that on April 16, 2019, this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ John L. Littrell
John L. Littrell